



Superintendent's Order # 31

Safety and Sustainability

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| For More Information, Contact: | Superintendent |
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| Approved: | <div style="text-align: center;">/s/</div> <div style="text-align: center;">_____ Robert J. Krumenaker, Superintendent</div> |

Purpose and Background

The National Park Service is committed to high standards of safety and environmental stewardship at Apostle Islands National Lakeshore. This Superintendent's Order defines "safety" and "sustainability," establishes the park's objectives for them, and establishes a park committee to establish goals, monitor progress, and assure accountability.

Our most valuable resources are the people who work to carry out the mission of the park. Whether paid staff, volunteers, or contracted personnel, the bottom line is the same--we want our employees and their families to be safe and healthy both at work and at home. Virtually all injuries and occupational illnesses are preventable and the park long-term goal for employee accidents is to have none.

Our attitude towards safety and our attitude towards environmental stewardship are intimately linked, and therefore they are under one policy and one operational umbrella.

In 2005, *National Geographic Traveler* Magazine named Apostle Islands National Lakeshore the nation's most sustainable national park. In 2005 and 2006, the governments of four of the park's gateway communities (the cities of Ashland, Washburn, and Bayfield and the town of Bayfield) each passed resolutions committing themselves to the goal of sustainability and following The Natural Step. Several of these resolutions acknowledged the park as a leader in the community effort towards sustainability.

This Superintendent's Order defines the goals, commitments, and processes we will implement to assure that we deserve and continue to deserve such recognition. The combined energy of the entire organization is necessary to continuously improve safety and environmental performance.

This Superintendent's Order shall serve as Apostle Islands National Lakeshore's *Environmental Commitment Statement*.

Food for Thought

“In an organization like this, short-handed as we are and with all the exceptional episodes that have to be dealt with, we are inclined to devote a disproportionate amount of time to the mechanics of our business and a minimum to the fundamentals, which deal many times with intangibles. It is good, therefore, that there are thinkers who periodically call us back to consideration of the matters of prime importance.”

— Written in October 1944 by NPS Director Newton Drury in a letter to Ansel Adams.

Definitions

Safety means the freedom or avoidance of harm, injury, loss, or hazard, or undue risk of any of these. A safe workplace is one where employees are well trained, the equipment and materials used are in proper working order and meet or exceed all operating standards and requirements, and individuals take responsibility for assuring that their actions and the actions of those around them use all appropriate precautions to assure that the work is accomplished without harm, injury, loss, or hazard.

Sustainability means many things to different people and organizations, but virtually all definitions contain the common elements of environment, economics, and community and establish the interrelatedness of all three. National Park Service Management Policies commit to sustainable operations, but do not define it. For Apostle Islands, our commitment to sustainability means a commitment to strive for maximum sensitivity and protection for the park's (and the planet's) natural and cultural resources, doing so in a way that is economically sensible and considers the short and the long term impacts of our decisions. It also means treating our people as a valuable resource and valuing our role and contribution to the wider community of which the park and its staff and visitors are members. Another way of saying this is that, safety factors being equal, we will strive for the longest lasting, cost-effective, environmentally-sensitive approach.

Considered together, Safety and Sustainability are an integrated means of assuring park excellence for the long term.

The Natural Step

The Natural Step¹ is a framework adopted by many communities and organizations in the United States and around the world to guide the journey towards sustainable practices. We recognize that many of our existing practices are not sustainable, and economic or practical reasons often exist that attempt to explain why we can not instantly transition to a fully sustainable operation. Several of the park's gateway communities have adopted resolutions declaring themselves “EcoMunicipalities” and committing to sustainable development. The park can and should be a significant player in the local effort towards sustainability. Accordingly, we hereby commit to all reasonable efforts to implement sustainable practices in planning, operations, management decisions, and policy development at the Apostle Islands National Lakeshore, consistent with The Natural Step as follows:

¹ <http://www.naturalstep.org/com>

| Natural Step System Condition ("In the sustainable society...") | Apostle Islands National Lakeshore Sustainable Principle |
|---|---|
| Nature is not subject to systematically increasing concentrations of substances extracted from the earth's crust. | Eliminate the park's use of non-renewable energy sources and re-use and recycle non-renewable natural resources. |
| Nature is not subject to systematically increasing concentrations of substances produced by society. | Eliminate the park's use of toxic substances harmful to our environment and community and reduce our dependence upon synthetic materials that do not break down to harmless substances. |
| Nature is not subject to systematically increasing degradation by physical means. | Manage the park's land, water, soil, wildlife, and other natural resources in ways that improve their condition and mimics or restores natural conditions wherever possible. |
| Human needs are met worldwide. | Strengthen our staff and local community by honoring their diversity and culture, assuring safe practices and facilities for their use, and encouraging full and fair civic engagement in park affairs. |

We acknowledge that these principles (especially the first two) are not completely attainable in the short run. The NPS will consider these principles in our planning and operations and strive, to the degree possible, to match our actions to these principles.

Environmental Management

Environmental Management is a systematic and proactive approach to focus an organization's time and effort on environmental matters of prime importance while making the mechanics of environmental compliance and management easier and more reliable. The NPS Environmental Management System (EMS) emphasizes internal goal setting and planning as a means to achieve lasting environmental benefits and is an important component of Apostle Islands National Lakeshore's sustainability efforts.

Integrated Park Goals for Safety and Sustainability

1. There will be no preventable workplace accidents, spills, or lost time injuries at Apostle Islands National Lakeshore. Nearly all accidents that occur in parks are the result of unsafe acts performed by employees. Achieving a safe and sustainable workplace and avoiding accidents are the responsibility of each employee. Working safely is a condition of employment at Apostle Islands National Lakeshore, and we each must take full responsibility for our own actions. The recognition and elimination of unsafe acts and unsafe conditions will be identified as an important aspect of each employee's performance.
2. Safety and environmental performance will be considered in everything we do, by every employee, starting from the top. Accountability for providing a safe workplace, a strong safety culture, and a culture of sustainability within the park rests with line management. Park

supervisors from the Superintendent through first line supervisors are charged with ensuring that their leadership creates a workplace climate which enhances safety communication and sustainable practices. Line managers and supervisors have the primary responsibility for leading regular inspections and audits of their work areas and for the prompt and thorough reporting and investigation of accidents. Employees at every level will participate in inspection of their work areas, critique of their work practices, and investigation of accidents.

We will assign clear responsibility to our employees for safety and environmental activities and hold them accountable for their performance, recognizing superior effort when it is demonstrated. Performance standards for all supervisors will include a safety and environmental performance element.

3. Employees will receive sufficient training to perform their work safely and in an environmentally sound, sustainable manner. Supervisors will assure that employees are not assigned to tasks for which they have not received training in safe and appropriate work practices, and will identify and arrange for special orientation, training, or certification required for the operation of all equipment.
4. Accidents, with or without injuries, will be investigated in a prompt and thorough manner so that we learn from and do not repeat them. Supervisors will promptly perform initial investigation and reporting through the Safety Management Information System for all accidents. Division Chiefs, in consultation with the Safety Officer, will lead or appoint a work group to investigate and report additionally on all lost time accidents and any other accidents targeted through the consultation. These investigations will be directed toward identifying root causes of accidents and making recommendations to prevent their happening again. The Superintendent and the S&S committee will review these reports for sufficiency and for implementation of recommendations.
5. Lessons learned from near misses and accidents will be identified and shared with all employees. The purpose of near-miss investigations is to learn all possible lessons in order to prevent similar accidents from reoccurring. The information learned from self reporting and investigations will be shared with all staff in a non-confrontational manner. Management and supervisory staff will foster an environment that promotes open dialogue with involved parties and other staff. Employees will be encouraged to report their own near-misses to their supervisors.
6. Park operational equipment will be maintained in a safe and environmentally sound condition. Employees and supervisors will maintain the equipment they use in a safe and environmentally sound condition and operate that equipment at all times within its safe operating limitations. Supervisors will forward information on safety or environmental-related equipment repair or replacement needs to the management team for consideration in budget allocation decisions. Critical deficiencies will be corrected promptly or the equipment will be red-lined. Supervisors will never knowingly assign employees to work with unsafe equipment or in hazardous conditions without proper training and personal protective equipment. If it can't be used safely or without causing unacceptable environmental damage, we won't use it.

7. We are committed to continuous improvement. We will establish quantifiable metrics in our objectives and targets and monitor our safety and environmental performance.
8. Our sustainability efforts will lead by example. Apostle Islands National Lakeshore will strive to be a leader in the NPS and in our community in sustainable practices, and park staff will use the park's high visibility to communicate with park visitors on our efforts and the applicability of sustainable practices beyond the park. Park employees will be encouraged to apply sustainable practices at home, and bring best practices they learn about to the workplace. The park's internet and intranet web sites will showcase our sustainable practices and our participation in a wider effort in our community and in the NPS. The NPS will seek to partner with the City of Bayfield to apply sustainable practices to the operation and maintenance of the historic Bayfield County Courthouse which serves as the park's headquarters and visitor center, and share the successes and challenges with the Bayfield community and park visitors.

A Commitment to Best Practices

We will achieve these simple but profound goals by implementing and rewarding workplace behavior that demonstrates exemplary safety, environmental management, and sustainable practices. These include, but are not limited to:

- Making the safety of employees a priority in all park operations, as directed by DO-50.
- Always considering the safety of park visitors, in park management decisions, with appropriate recognition of the inherent risks in recreation in a remote, wilderness, and marine environment.
- Going beyond compliance by fostering the sustainable use of natural resources by integrating and implementing pollution prevention, waste reduction, environmental purchasing, and Best Management Practices (BMPs) into all our operations and daily practices and program management responsibilities. The Park's Sustainability BMPs will be kept up-to-date and accessible to all employees on the our intranet site, and considered an appendix to this SO. Employees will be encouraged to contribute to, and expected to follow or exceed, the BMPs.
- Coordinating park operations with other agencies to promote safe and sustainable sound practices.
- Participating in local and regional sustainability efforts, and demonstrating leadership by example when appropriate.
- Incorporating OSHA guidelines and regulations as our *minimum* safety standards.
- Incorporating EPA guidelines and regulations as our *minimum* environmental standards.
- Correcting safety and environmental deficiencies as soon as practicable.
- Conducting routine safety and environmental checks of employee, contractor, and business partner operations and seeking opportunities to praise and reward positive actions and behavior. Specific inspections include hazardous trees, structural fire, equipment, vehicles, boats, trails, buildings, etc.
- Conducting regular and impromptu "tailgate" sessions and formal training to share safe practices and techniques to improve sustainable operations.

- Using and conserving energy wisely and economically, meeting or exceeding the standards established by the Energy Policy Act of 1992 and subsequent federal laws and regulations.
- Creatively implementing alternative and bio-based energy, fuels, lubricants, and solvents in place of petroleum products.
- Educating and motivating employees, and then the public, to utilize safe and sustainable practices, including interpreting and marketing the park's successes (and challenges).
- Recycling everything that it makes environmental and economic sense to recycle.
- Practicing "green procurement" whenever feasible.
- Reducing and managing invasive and exotic species.
- Planning and designing facilities, operations, management decisions, and policy development that affect the park, its workers, the environment, and the community with these considerations in the foreground.
- Assuring that the park's required safety plans and environmental management system are up-to-date and easily available via the park intranet for employees to access and use.
- Assuring effective hazardous materials communications so no employee is uninformed about the potentially-hazardous materials used on the job and how to use them properly and respond in the event of accident.
- Maintaining a vibrant park intranet site devoted to safety, environmental management, and sustainability.
- Establishing and maintaining a park Safety and Sustainability Committee.

The Safety and Sustainability (S&S) Committee

The Apostle Islands National Lakeshore, Safety and Sustainability Committee's goal is to provide leadership and direction to ensure that park employees use sound environmental, sustainable and safe practices in the everyday work environment.

The S&S Committee will function to provide continual evaluation and oversight of the park's safety, environmental management, and sustainability efforts, to make recommendations for improvement, and to increase safety and sustainability awareness of employees.

Specifically, the S&S Committee will:

- Review all accidents and near misses, and investigations.
- Disseminate "lessons learned" to all employees.
- Be responsible for a Job Hazard Analysis program.
- Coordinate the formal Environmental Management System with other park sustainability efforts.
- Establish quantifiable targets for safety and environmental performance and monitor and report how well we are doing. Examples include our lost time injury rate, number of days since an accident, and various targets established through the EMS.
- Maintain the park's intranet site devoted to safety, environmental management, and sustainability.
- Review and approve sustainability BMPs for the park and post them on the intranet.
- Recommend parkwide training and awareness functions for safety and sustainability.

- Establish and meet its own deadlines for accomplishing these activities, subject to directives from other levels of the NPS.
- Encourage a culture where exemplary performance on safety, environmental management, and sustainability are valued, expected, and rewarded.

Since leadership commitment is essential to success, membership on the S&S committee will start with the Superintendent, who will chair the committee, and all park Division Chiefs. The Safety Officer will also be a permanent member of the S&S committee. In addition, chairs of the following subcommittees will be members of the S&S committee, serving for renewable 2 year terms. The intent is to assure that the diversity of park operations be represented on the committee.

| Subcommittee | 2003-2006 Chair | 2007-2008 Chair |
|---|-----------------------------------|-----------------------------------|
| Marine Safety | Supervisor, Marine and Grounds | Supervisor, Marine and Grounds |
| Safety Information | Biologist | IT Specialist |
| Sustainability | n/a | Biologist |
| Backcountry Management [liaison] ² | n/a | Park Ranger, Cultural Educator |

Subcommittee members will be appointed by the Superintendent upon recommendation of the S&S committee, but are not members of the S&S committee themselves. They, and all other park employees, will always be welcome at meetings, however. The Superintendent, upon advice of the S&S Committee, may establish ad hoc subcommittees as needed.

Meetings will normally be held every other month, on a schedule determined by the committee. Note-taking will be rotated amongst all members of the committee except the Superintendent, using a simplified format determined by the committee. Draft notes will be sent to the Superintendent for review and approval and then distributed to all park employees and the regional safety officer as quickly as possible after each meeting.

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² The Backcountry Management Team (BMT) is an independent committee whose purpose and function is outlined in [Superintendent's Order #28](#). The chair of the BMT will be a member of the Safety & Sustainability Committee, serving a liaison function between the two groups.